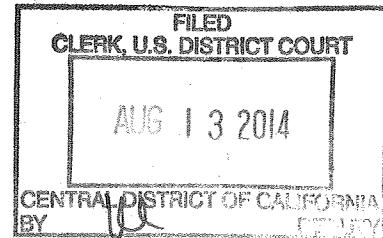


1 STEPHANIE YONEKURA
2 Acting United States Attorney
3 ROBERT E. DUGDALE
4 Assistant United States Attorney
5 Chief, Criminal Division
6 PAUL STERN (Cal. Bar No. 162734)
7 Assistant United States Attorney
8 Major Frauds Section
9 1100 United States Courthouse
10 312 North Spring Street
11 Los Angeles, California 90012
12 Telephone: (213) 894-0715
13 Facsimile: (213) 894-6269
14 E-mail: paul.stern@usdoj.gov

ORIGINAL



15 Attorneys for Plaintiff
16 UNITED STATES OF AMERICA

17 2014 AUG 12 PM 3:30

18 DEPARTMENT OF JUSTICE
19 UNITED STATES ATTORNEY
20 FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

21 UNITED STATES OF AMERICA,

No. CR 11-762-PSG

22 Plaintiff,

CRIMINAL DOCUMENT FILED UNDER SEAL

23 v.

(UNDER SEAL)

24 JANETH BREWER,

25 Defendant.

26 //

27 //

28 //

//

//

//

//

//

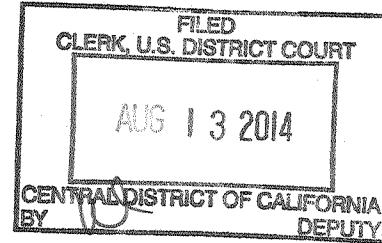
//

//

LODGED

ORIGINAL

1 STEPHANIE YONEKURA
2 Acting United States Attorney
3 ROBERT E. DUGDALE
4 Assistant United States Attorney
5 Chief, Criminal Division
6 PAUL STERN (Cal. Bar No. 162734)
7 Assistant United States Attorney
8 Major Frauds Section
9 1100 United States Courthouse
10 312 North Spring Street
11 Los Angeles, California 90012
12 Telephone: (213) 894-0715
13 Facsimile: (213) 894-6269
14 E-mail: paul.stern@usdoj.gov



8 Attorneys for Plaintiff
9 UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 NO. CR 11-762-PSG

14 Plaintiff,

15 CRIMINAL DOCUMENT FILED UNDER SEAL

16 v.

17 (UNDER SEAL)

18 JANETH BREWER,

19 Defendant.

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28 //

1 STEPHANIE YONEKURA
2 Acting United States Attorney
3 ROBERT E. DUGDALE
4 Assistant United States Attorney
5 Chief, Criminal Division
6 PAUL G. STERN (Cal. State Bar No. 162734)
7 Assistant United States Attorney
8 Senior Litigation Counsel
9 Major Frauds Section
10 1100 United States Courthouse
11 312 North Spring Street
12 Los Angeles, California 90012
13 Telephone: (213) 894-0715
14 Facsimile: (213) 894-6269
15 E-mail: paul.stern@usdoj.gov
16 Attorneys for Plaintiff
17 UNITED STATES OF AMERICA

18 UNITED STATES DISTRICT COURT

19 FOR THE CENTRAL DISTRICT OF CALIFORNIA

20 UNITED STATES OF AMERICA,) CR No. 11-762-PSG
21 Plaintiff,) GOVERNMENT'S EX PARTE APPLICATION
22 v.) FOR ORDER SEALING DOCUMENTS;
23 JANETH BREWER,) DECLARATION OF PAUL G. STERN
24 Defendant.) [UNDER SEAL]
25 _____)

26 The government hereby applies ex parte for an order that the lodged
27 Government's Motion For Downward Departure For Substantial Assistance
28 Pursuant to USSG § 5K1.1 and Statement of Sentencing Position, as well
as this ex parte application, be filed under seal.

29 //

30 //

This ex parte application is based on the attached declaration of Paul G. Stern.

DATED: August 12, 2014

Respectfully submitted,
STEPHANIE YONEKURA
Acting United States Attorney

ROBERT E. DUGDALE
Assistant United States Attorney
Chief, Criminal Division

PAUL G. STERN
Assistant United States Attorney
Senior Litigation Counsel
Major Frauds Section

Attorneys for Plaintiff
UNITED STATES OF AMERICA

DECLARATION OF PAUL G. STERN

I, Paul G. Stern, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I represent the government in this case.

2. The government requests leave to file the Government's Motion For Downward Departure For Substantial Assistance Pursuant to USSG § 5K1.1 and Statement of Sentencing Position relating to defendant JANETH BREWER ("defendant") in this matter under seal. Public disclosure of defendant's identity as an individual who has cooperated with the government in its investigation and prosecution of other individuals would tend to expose defendant BREWER to unnecessary risks once she begins serving whatever sentence is imposed in the above-entitled matter. Granting the government's request will tend to mitigate these unnecessary risks to defendant BREWER.

3. Accordingly, the government requests that the Government's Motion For Downward Departure For Substantial Assistance Pursuant to USSG § 5K1.1 and Statement of Sentencing Position relating to defendant and this application be filed under seal.

4. Should the court deny this application, the government requests that the Government's Motion For Downward Departure For Substantial Assistance Pursuant to USSG § 5K1.1 and Statement of Sentencing Position and this application not be filed, but

11

1 be returned to the government, without the filing of documents or
2 reflection of the name or nature of the documents on the clerk's public
3 docket.

4 I declare under penalty of perjury that the foregoing is true and
5 correct to the best of my knowledge and belief.

6 DATED: August 12, 2014

Paul G. Stern

7 PAUL G. STERN

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I, YENI GOMEZ, declare

That I am a citizen of the United States and a resident of or employed in Los Angeles County, California; that my business address is the Office of United States Attorney, 312 North Spring Street, Los Angeles, California 90012; that I am over the age of 18; and that I am not a party to the above-titled action;

That I am employed by the United States Attorney for the Central District of California, who is a member of the Bar of the United States District Court for the Central District of California, at whose direction the service by mail described in this Certificate was made; that on **August 12, 2014** I deposited in the United States mail at the United States Courthouse in the above-titled action, in an envelope bearing the requisite postage, a copy of: **GOVERNMENT'S EX PARTE APPLICATION FOR ORDER SEALING DOCUMENTS; DECLARATION OF PAUL G. STERN [UNDER SEAL]**

service was:

Placed in a closed envelope for collection and inter-office delivery, addressed as follows:

Placed in a sealed envelope for collection and mailing via United States mail, addressed as follows:

By hand delivery, addressed as follows:

By facsimile, as follows:

By messenger, as follows:

By electronic mail, as follows:

Maytee Zendejas
U.S. Probation Office
21041 Burbank Blvd., Suite 200
Woodland Hills, CA 91367-6606

at their last known address, at which place there is a delivery service by United States mail.

This Certificate is executed on August 12, 2014 at Los Angeles, California. I certify under penalty of perjury that the foregoing is true and correct.

~~Yeni Gomez
Legal Assistant~~